

Mr. Greg Szabo  
Gaska Tape, Inc.  
P. O. Box 1968  
Elkhart, Indiana 46515

Re: Minor Source Modification No:  
039-11551-00077

Dear Mr. Szabo:

Gaska Tape, Inc. applied for a Part 70 operating permit on July 31, 1996 for a paper and foamed plastic adhesive tape manufacturing plant. An application to modify the source was received on November 17, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) custom lamination line, CLL-1 which is capable of using 23.5 gallons of coating per hour. The coating is applied by a knife edge and thin roll coating system; and
- (b) One (1) natural gas-fired dryer oven, OVCST-1 with four (4) burners, identified as BRN-1 through BRN-4. Burner, BRN-1 has a heat input capacity of 850,000 British Thermal Units per hour (Btu/hr). Burners, BRN-2 through BRN-4 have heat input capacities of 500,000 Btu/hr each.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.  
If you have any questions on this matter call (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

APD

cc: File -Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Gaska Tape, Inc.  
1810 West Lusher Avenue  
Elkhart, Indiana 46515**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

1 <sup>st</sup> Minor Source Modification No.: 039-11551-00077	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary paper and foamed plastic adhesive tape manufacturing plant.

Responsible Official:	Mr. Greg Szabo
Source Location:	1810 West Lusher Ave., Elkhart, Indiana 46517
Mailing Address:	P.O. Box 1968, Elkhart, Indiana 46515
Phone Number:	219-294-5431
SIC Code:	3086
County Location:	Elkhart
County Status:	Maintenance for Ozone; Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units:

- (a) One (1) custom lamination line, CLL-1 which is capable of using 23.5 gallons of coating per hour. The coating is applied by a knife edge and thin roll coating system; and
- (b) One (1) natural gas-fired dryer oven, OVCST-1 with four (4) burners, identified as BRN-1 through BRN-4. Burner, BRN-1 has a heat input capacity of 850,000 British Thermal Units per hour (Btu/hr). Burners, BRN-2 through BRN-4 have heat input capacities of 500,000 Btu/hr each.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

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This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

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Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

## **SECTION C GENERAL OPERATION CONDITIONS**

### **C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### **C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### **C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.5 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.



- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

##### **C.8 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **C.9 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

### **C.10 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.11 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## **Section D.1 Facility Operation Conditions**

### **Facility Description [326 IAC 2-7-5(15)]**

- (c) One (1) custom lamination line, CLL-1 which is capable of using 23.5 gallons of coating per hour. The coating is applied by a knife edge and thin roll coating system; and
- (d) One (1) natural gas-fired dryer oven, OVCST-1 with four (4) burners, identified as BRN-1 through BRN-4. Burner, BRN-1 has a heat input capacity of 850,000 British Thermal Units per hour (Btu/hr). Burners, BRN-2 through BRN-4 have heat input capacities of 500,000 Btu/hr each.

### **Operation Conditions**

#### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

##### **D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-5]**

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause or allow the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the proposed custom laminating line CLL-1 coating applicator.

##### **D.1.2 Volatile Organic Compound (VOC)**

Any change or modification which may increase the CLL-1 VOC input usage to the coating process to 45 megagram (Mg) per 12 month period must be approved by the Office of Air Management (OAM) before such change may occur, and shall be subject to 326 IAC 20, 40 CFR Part 60.440, Subpart RR (Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations). (Note: 1.1Mg is equivalent to 1 ton)

#### **Compliance Determination Requirements**

##### **D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing of the Part 70 Permit.

##### **D.1.4 Volatile Organic Compounds**

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.1.5 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance VOC emission limit established in Condition D.1.1.

- (1) The amount and VOC content of each coating material used. Records shall include inventory records, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) A monthly log of the dates of use;
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 Minor Source Modification

#### Source Background and Description

Source Name:	Gaska Tape, Inc.
Source Location:	1810 West Lusher Avenue, Elkhart, IN 46515
County:	Elkhart
SIC Code:	3086
Operation Permit No.:	T 039-6352-00077
Operation Permit Issuance Date:	Pending
Minor Source Modification No.:	039-11551-00077
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed a modification application from Gaska Tape, Inc. relating to the construction of the following emission units used in the paper and foamed plastic adhesive tape production:

- (a) One (1) custom lamination line, CLL-1 which is capable of using 23.5 gallons of coating per hour. The coating is applied by a knife edge and thin roll coating system; and
- (b) One (1) natural gas-fired dryer oven, OVCST-1 with four (4) burners, identified as BRN-1 through BRN-4. Burner, BRN-1 has a heat input capacity of 850,000 British Thermal Units per hour (Btu/hr). Burners, BRN-2 through BRN-4 have heat input capacities of 500,000 Btu/hr each.

#### History

On November 11, 1999, Gaska Tape, Inc. submitted an application to the OAM requesting to add an additional laminating line and associated equipment to their existing plant. Gaska Tape has submitted a Part 70 permit on July 31, 1996, which is pending for issuance.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SV-LL-01	Coating Line & dryer OVCST-1	29	1.66	10,600	77

## Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 11, 1999.

## Emission Calculations

- (a) Custom lamination line, CLL-1 emissions: See confidential spreadsheet on Page 1 of 2 TSD Appendix A for detailed emissions calculations.
- (b) Natural gas-fired combustion emissions: See Page 2 of 2 TSD Appendix A for detailed emissions calculations.

## Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.1
SO <sub>2</sub>	0.0
VOC	14.54
CO	0.9
NO <sub>x</sub>	1.0

HAPs	Potential To Emit (tons/year)
Vinyl Acetate	1.04
TOTAL	1.04

## Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification, 326 IAC 2-710.5(d), since the volatile organic compounds (VOC) emissions are greater than 10 tons per year but less than 25 tons per year.

## County Attainment Status

The source is located in Elkhart County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## Source Status

Existing Source PSD Definition (emissions after controls, based upon limitations. These limitations were based on existing approvals for the source, which were issued at a time when Elkhart County was designated as nonattainment for ozone under Emission Offset, 326 IAC 2-3).

Pollutant	Emissions (tons/year)
PM	0.04
PM-10	0.0
SO <sub>2</sub>	0.008
VOC	198.0
CO	0.266
NO <sub>x</sub>	1.331

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

## Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.



	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Custom Lamination Line, CLL-1	0.0	0.0	0.0	14.44	0.0	0.0	1.04
Dryer Oven, OVCST-1	0.0	0.1	0.0	0.1	0.9	1.0	0.0
<b>TOTAL</b>	<b>0.0</b>	<b>0.1</b>	<b>0.0</b>	<b>14.54</b>	<b>0.9</b>	<b>1.0</b>	<b>1.04</b>

This modification to an existing minor stationary source is not major because the emission increase is less than 250 tons per year. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### Federal Rule Applicability

(a) New Source Performance Standards (NSPS)

- (1) 40 CFR Part 60.440, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. This NSPS applies to each coating line used in the manufacture of pressure sensitive tape and label materials, which inputs to the coating process more than 45 Megagram (Mg) (1.1 Mg is equivalent to 1 ton) of VOC per 12 month period, which begins construction, modification or reconstruction after December 30, 1980.

This NSPS is not applicable to the proposed custom laminating line CLL-1, because its VOC input is well below 45 Megagram (Mg) per 12 month period.

- (2) There are no other NSPS that can possibly be applicable to the custom laminating line, CCL-1 and the dryer oven, OVCST-1.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

- (1) 326 IAC 14 and 40 CFR Part 63.701, Subpart EE - National Emission Standards for Magnetic Tape Manufacturing Operations. This NESHAP is not applicable to the proposed custom laminating line, CLL-1, because the source does not manufacture magnetic tape.

- (2) There are no other NESHAPs that can possibly be applicable to the custom laminating line, CCL-1 and the dryer oven, OVCST-1.

#### State Rule Applicability

(a) 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (1) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

- (2) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.
- (b) 326 IAC 6-2 (Particulate Emission Limits for Indirect Heating)  
The four (4) burners, BRN-1 through BRN-4 for the dryer oven, OVCST-1 are not subject to this rule, because they are not sources of indirect heating.
- (c) 326 IAC 6-3-2 (Process Operations)  
This rule is not applicable to the custom laminating line, CLL-1 because no PM overspray is emitted from this line.
- (d) 326 IAC 8-2-5 (Paper Coating Operations)  
This rule applies to facilities for which construction commences after July 1, 1990 located in any county and which have actual emissions greater than fifteen (15) pounds of VOC per day before add-on control.

The custom laminating line CLL-1 is subject to this rule, since it can potentially achieve an actual emissions greater than (15) pounds of VOC per day. Pursuant to this rule, the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of thirty-five hundredths (0.35) kilograms per liter of coating (two and nine-tenths (2.9) pounds per gallon) excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.

This line is in compliance with the rule, since all the coatings to be used will emit VOC less than 2.9 pounds per gallon less water (see Confidential Page 1 of 2 TSD Appendix A).

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

## Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 **Minor Source Modification No. 039-11551-00077**.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**Small Industrial Boiler**

**Company Name:** Gaska Tape, Inc.

**Address, City IN Zip:** 1810 W. Lusher Ave., Elkhart, IN 46515

burner 1 for dryer @ .85 mmBtu/hr **CP:** 039-11551  
 burner 2 for dryer @ 0.5 mmBtu/hr **Pit ID:** 039-00077  
 burner 3 for dryer @ 0.5 mmBtu/hr **Reviewer:** Aida De Guzman  
 burner 4 for dryer @ 0.5 mmBtu/hr **Date:** Address, City IN Zip:

Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

2.4

20.6

**Pollutant**

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.0	0.1	0.9

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
 above  
 emission